

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII

999 18th STREET - SUITE 500 DENVER, COLORADO 80202-2466

FEB 7 2000

REF: 8P-W-GW

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Charles Adams Marathon Oil Company 1501 Stampede Avenue Cody, WY 82414-4721

> RE: Minor Modification Approval EPA Permit No. WY2819-04366 Shoshone #66-66, Circle Ridge Field, Fremont County, WY

Dear Mr. Adams:

This letter is in response to your electronic mail message of January 24, 2000, to Mr. Emmett Schmitz of the Region 8 Ground Water Program office of the Environmental Protection Agency (EPA), regarding a letter from Mr. Eugene Grant dated June 15, 1999. In your message you inquired as to the status of EPA Permit No. WY2819-04366 (the Permit), for the Shoshone #66-66 well in the Circle Ridge Field on the Wind River Indian Reservation, Fremont County, WY. You also requested clarification of requirements for approval to inject only into the Darwin Formation.

As discussed between you and Dan Jackson of my staff by telephone on January 31, 2000, the Permit authorizes the permittee to inject into the Darwin Formation. Under Part II.C.3., on page 10 of the Permit the authorized injection interval "shall be limited to the overthrust Phosphoria-Tensleep-Amsden-Darwin Formations, between the gross depths of 462 feet to 1408 feet."

The Permit incorporates the proposed construction details submitted with the application in the form of a well construction schematic under, Appendix A of the Permit. The construction schematic details a dual tubing string configuration intended for dual injection into both the Phosphoria Formation and the Darwin Formation. The June 15, 1999, letter from Mr. Grant included an updated proposed well construction schematic showing the well

completion details with a single tubing string for injection only into the Darwin Formation, and the packer set at 1,200 feet, or within 100 feet of the top Darwin Formation perforation at 1,250 feet, as required by the Permit. Pursuant to 40 CFR 144.41(f), a change in construction plans during construction may be approved by the Director as a minor permit modification.

The proposed change in well construction from a dual injector to a single injector is hereby approved as a minor permit modification under 40 CFR 144.41(f). The updated proposed well construction schematic showing the well completion details with a single tubing string, attached to the June 15, 1999, letter from Mr. Grant, is hereby incorporated for this modification.

Please be aware that the Permit contains requirements that must be fulfilled prior to receiving authorization to inject. These requirements may be found at Part II.C.1 Prior to Commencing Injection. Additionally, it is important that the permittee review requirements under Part II.A. and other parts of the Permit to assure complete compliance with the Permit. If you have any questions regarding this letter or the Permit, please call Mr. Dan Jackson at (303) 312-6155. Please send information and documents related to the Prior to Commencing Injection requirements of the Permit to the Ground Water Program Director at Mail Code 8P-W-GW.

Sincerely,

Kerrigan G. Clough

Assistant Regional Administrator

Office of Partnerships and

Regulatory Assistance

CC: Mr. Anthony Addison, Sr., Chairman Northern Arapahoe Tribe Arapahoe Business Council

> Mr. John Washakie, Chairman Eastern Shoshone Tribe Shoshone Business Council

Mr. Don Aragon, Director Wind River Environmental Quality Commission Mrs. Janie Nelson, Wyoming Oil and Gas conservation Commission

U.S. Department of the Interior Bureau of Indian Affairs, Wind River Agency

Mr. Stu Cervoski U.S. Department of the Interior Bureau of Land Management, Lander Resource Area

Mr. Nathan Wiser, 8ENF-T

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